

REMARKS

Claims 1, 3, 5-7 and 34 stand rejected under 35 USC 103(a) as being obvious over WIPO Publication No. 2004/103747 to Ericson in view of WIPO Publication No. 2004/014687 to Jensen. Applicant has amended the claims to more particularly define the present invention over the cited prior art.

More specifically, claim 1 has been amended to recite the following features:

- "first and second wire wrap around guide elements spaced from ... the mounting means"
- "the first and second wrap around guide elements each comprise a guide wheel or pulley rotatably mounted with respect to the unit and providing a rotatable interface over which the cutting wire passes whilst being wound by the first and second winder spools" and
- "the first and second winder spools are arranged in a side by side arrangement, the guide wheel or pulley of the first wrap around guide element is located in a position outwardly of one of the first and second winder spools, and the guide wheel or pulley of the second wrap around guide element is located in a position outwardly of the other of the first and second winder spools."

These features are not taught or suggested in the cited prior art.

The arrangement of WO2004/103747 employs wire guide grooves 13,14 that are co-located with respective suction mounts 7, 8 and thus does not employ "first and second wire wrap around guide elements spaced from ...the mounting means "as recited by amended claim 1. Moreover, the wire guide grooves 13, 14 of WO2004/103747 are non-rotatably fixed in position as part of the suction mounts 7, 8, and thus are different from the respective guide wheel or pulley of the first and second wrap around guide elements that is rotatably mounted with respect to the unit and provide "a rotatable interface over which the cutting wire passes whilst being wound by the first and second winder spools" as recited by amended claim 1. Moreover, the non-rotatable wire guide grooves 13, 14 of WO2004/103747 are not "a guide wheel or pulley"

located in a position outwardly of the respective first and second winder spools as recited by amended claim 1.

The arrangement of WO 2004/014678 does not remedy the shortcomings of WO2004/103747. It employs a wheel 20 for guiding a belt over a desired path. The belt is attached to a tool 4 that includes a cutting knife 50. Thus, the belt of WO 2004/014678 is not a cutting wire as recited in claim 1, and the wheel 20 does not provide any rotatable interface over which cutting wire passes whilst being wound by a winder spool, let alone respective rotatable interfaces over which cutting wire passes whilst being wound by first and second winder spools as recited in amended claim 1.

Thus, there are significant differences between the cited prior art and the particular arrangement of amended claim 1. Accordingly, amended claims 1 is clearly patentable over the cited prior art.

The dependent claims are patentable over the cited prior art for those reasons advanced above with respect to claim 1 from which they respectively depend and for reciting additional features that are not taught or suggested by the cited prior art.

In light of all of the above, it is submitted that the claims are in order for allowance, and prompt allowance is earnestly requested. Should any issues remain outstanding, the Examiner is invited to call the undersigned attorney of record so that the case may proceed expeditiously to allowance.

Respectfully submitted,

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